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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Kevin Lee Fisher,)	Case No. 2:22-cv-01615-DMC
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 7-day extension of time, from April 7, 2023, to April 14, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of March 27, 2023 and April 3, 2023, Counsel currently has 31 merit briefs, and several letter briefs and reply

1 briefs. This includes cases that undersigned counsel took on during co-counsel's,
2 Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly
3 brief this matter for the Court.

4 Counsel for Plaintiff is currently taking partial leave as his child was born on
5 October 14, 2022. Thus, Counsel is working limited hours.

6 Additionally, Counsel underwent major surgery on March 15, 2023,
7 requiring post-op physical therapy, with the need for several breaks throughout the
8 workday.

9 Defendant does not oppose the requested extension. Counsel apologizes to
10 the Defendant and Court for any inconvenience this may cause.

11
12 Respectfully submitted,

13 Dated: April 5, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

14
15 By: /s/ Jonathan Omar Pena
16 JONATHAN OMAR PENA
17 Attorneys for Plaintiff

18
19 Dated: April 5, 2023

20 PHILLIP A. TALBERT
21 United States Attorney
22 MATHEW W. PILE
23 Associate General Counsel
24 Office of Program Litigation
25 Social Security Administration

26 By: */s/ Susan Leah Smith
27 Susan Leah Smith
28 Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on April 5, 2023)

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: April 7, 2023

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE